



U.S. Department of Justice
United States Attorney
Eastern District of New York

F.#2010R01379

271 Cadman Plaza East
Brooklyn, New York 11201

March 9, 2013

BY ECF and Email

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Re: United States v. Drivas et al.
Criminal Docket No. 10-771 (S-1) (NG)

Dear Counsel,

In accordance with its responsibilities under Giglio v. United States, 405 U.S. 150 (1972), Brady v. Maryland, 373 U.S. 83 (1963), and their progeny, the government submits this letter. As described below, the government has obtained the following with respect to government witnesses.

(1) Larisa Shelabadova

- (a) Between May 2009 and October 2009, point-of-service purchases were made at various high-end retailers such as Gucci, Louis Vuitton, Emilio Pucci, Dolce & Gabbana, and Robert Cavali and at resorts and hotels such as Trump International from an account under the control of Larisa Shelabadova in the name of YT Transportation, Inc. See Bates Pages 17728-29, 17756, and 17782. There were also excessive restaurant bills at restaurants like Riviera Grill & Sushi. Id.
- (b) Larisa Shelabadova structured transactions in violation of banking laws by making multiple cash

Counsel in United States v. Drivas et al.
March 9, 2013
Page 2

withdrawals below the \$10,000 threshold that she knew required the filing of a cash transaction report. Specifically, between May 4, 2009 and September 15, 2009, there were structured cash withdrawals on an account held in the name of YT Transportation, to which Shelabadova was the sole signatory. See Bates Pages 17704, 17731, 17756, and 17782. In a report of interview dated January 16, 2013 Larisa Shelabadova recalled being told by Anatoly Kraiter only to withdraw cash in amounts under \$10,000. See 3500-LS-15.

- (c) Larisa Shelabadova engaged in financial transactions, such as receiving checks and funds transfers, with other entities relevant to this case, including Yeryoma Medical Supply, MAMS Consulting and Collection LLC, YG Best Advertising, SZS Medical Care PLLC, SVS Medical Care, Kolkneva Entertainment, DK Best Advertising, Akol Supply, Alfa Advertising, TLY Consulting Group, NATA Medical Supply, Ania Development, and A to Z Wholesale.
- (d) Larisa Shelabadova and Dmitri Spessivov were co-signers to an account in the name of an entity called Papikan Express, Inc.

(2) Maksim Shelikhov and Irina Shelikhova

- (a) Maksim Shelikhov was a signatory to accounts held in the name of SZS Medical PLLC and SVS Wellcare Medical PLLC.
- (b) Maksim Shelikhov was a co-signer with Irina Shelikhova on an account in the name of Double M Medical Care PLLC.

In addition, the government has information regarding JP Morgan Chase bank records for Alfa Advertising, an account to which Aleksander Zaretser was a signatory, that were previously produced to you on December 9, 2011. Those records show that, on or about March 5, 2010, money from that account was deposited into an account belonging to JP Morgan Chase employee Elizabeth Burgos. See Bates Page 12746. In a letter dated March 5, 2013, defense counsel Eric Creizman identified Ms. Burgos as a potential source of exculpatory information.

Counsel in United States v. Drivas et al.
March 9, 2013
Page 3

Finally, the government has learned that the email address "larisaoleg@yahoo.com was listed in bank records as associated with the following people and/or companies: Yelena Galper/YB Medical Supply Inc.; Aleksander Zaretser and Nata Medical Supply.

Respectfully submitted,

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